

¹ *In the Matter of Telecommunications Relay Services, and Speech-to-Speech for Individuals with Hearing and Speech Disabilities*, Order, CC Dkt 03-123, DA 07-5098 (December 26, 2007) (2007 Waiver Order).

interpreter). For VRS and other IP-based relay calls, one-line VCO requires a voice over IP (VoIP) service to provide the audio portion of the one-line VCO call. To effectively complete a one-line VCO call over VoIP, the Internet connection between the video interpreter (VI) and VCO user must provide something called Quality of Service (QoS), which contains requirements placed on the Internet connection to ensure, among other things, that the associated data packets arrive in one contiguous stream, so that the recipient can make sense of the message that has been sent. But QoS is not consistent in the Internet world: multiple providers use several different types of equipment and routers, each of which implements QoS in different ways (some support QoS; some do not). Because the Internet cannot be controlled by any single user, at this time there is no universal, cooperative methodology to address Internet deficiencies to ensure that audio messages arrive in order and intact, in a manner that can be understood by the recipient. For the present time, then, IP-based providers, including CSDVRS, are unable to guarantee that the quality of the voice leg of the call will be consistently acceptable across all end user devices and routing equipment.

As an alternative to one-line VCO, CSDVRS also currently offers all VRS users the ability to use VCO by using a second (analog) line, wherein the VI communicates with the video relay caller using an IP connection for the interpreted portion of the call, and the public switched telephone network (PSTN) for the leg from the voice user. This is accomplished by having the VI ask the caller for a second number to call back, so that the VI can use the

three-way calling feature. The procedure is similar to two-line VCO calls made over the PSTN.

Because there are no indications that technologies will be available to resolve the difficulties presented by one-line VCO over VRS in the immediate future, this relay feature should continue to be waived.

B. VCO-to-TTY and VCO-to-VCO

For the same reasons CSDVRS and other IP-based providers are unable to provide one-line VCO (inconsistencies in QoS), we are also unable to provide VCO-to-TTY and VCO-to-VCO. In addition, as a provider of video relay services that uses interpreters to relay conversations, CSDVRS is not designed to connect an inbound VCO caller when the called party is also a VCO user or a TTY user because videoconferencing of these callers via Internet protocols is not compatible. Because there are no indications that technologies will be available to resolve the difficulties presented by VCO-to-TTY or VCO-to-VCO over VRS in the immediate future, this relay feature should continue to be waived.

C. One-line Hearing Carry Over (HCO)

HCO is a feature that allows individuals who have speech disabilities, but can hear, to hear what the other party is saying and use a relay service to convey their messages. The handling of HCO calls over VRS is extremely rare because most individuals who have speech disabilities but who can hear, generally do not use sign language.

For the same reasons that VCO is not currently technically feasible, single line HCO is not technically possible. Specifically, differences in QoS make the voice reception of these calls unpredictable over the Internet. For the reasons noted above, and because there are no indications that there will be technologies developed to resolve this problem in the immediate future, this relay feature should continue to be waived.

As an alternative to one-line HCO, CSDVRS currently offers all VRS users access to the HCO relay feature by using a second (analog) line, wherein the VI communicates with the video relay caller using an IP connection for the interpreted portion of the call, and the PSTN for the leg to the voice user. The VI accomplishes this by asking the caller for a second number to call back using the three-way calling feature. The procedure is similar to two-line HCO calls made over the PSTN.

D. HCO-to-TTY and HCO-to-HCO

For the same reasons CSDVRS and other IP-based providers are unable to provide one-line HCO (inconsistencies in QoS), we are also unable to provide HCO-to-TTY and HCO-to-HCO. In addition, as a provider of video relay services that uses interpreters to relay conversations, CSDVRS is not designed to connect an inbound HCO caller when the called party is also an HCO user or a TTY user because videoconferencing of these callers via Internet protocols is not compatible. Because there are no indications that technologies will be available to resolve the difficulties presented by HCO-to-TTY or HCO-to-HCO

over VRS in the immediate future, this relay feature should continue to be waived.

E. Call Release

In the case of VRS, the call release feature would allow the VI to be released from the telephone line after the VI connected the originating caller to the called party, without causing the call between the parties to be disconnected. Call release is often used for connecting callers that call into hotel, hospital or other institutional switchboards.

It remains technically infeasible to provide the call release for VRS calls. This is because in VRS, the customer utilizes a video connection over the Internet to make an inbound call and the VI then utilizes a voice channel (*SS7*) to make the outbound dial call to the hearing person on the PSTN. Because the two types of calls are not compatible, the call release feature is not technically possible. Also, CSDVRS questions whether the call release minimum standard even has application in the VRS environment because providers are unable to currently remove the VI from the call; nor would a provider ever want to do so, given the role of the interpreter in VRS calls. In addition, unlike TRS calls connecting text users over the PSTN, where the call release feature makes practical sense to allow one TTY user to reach another when a switchboard operated by a voice operator stands between these two callers, individuals wishing to converse with one another in sign language would both use the Internet, and contact each other directly, rather than through a relay service. This will become the case to an even greater extent

when a uniform numbering plan is put into place, facilitating point-to-point calls between individuals using sign language.

The presence of incompatible protocols warrants a continuation of the FCC's waiver for call release. In addition, CSDVRS suggests that the FCC consider making this waiver permanent because of its inapplicability to VRS.

F. Pay-per-call (900) calls

As the FCC notes in its 2007 Waiver Order, IP networks do not provide automated information about the user's automatic number identification (ANI) or automatic location identification (ALI). Nor do these networks provide support for end-user billing mechanisms. Without any of this information, and without the ANI to charge the customer for a pay-per-call service, CSDVRS cannot bill for these calls and therefore cannot process 900 calls. CSDVRS is unaware of any technology to resolve the technical challenge of tying an exact location to callers for the billing of 900 pay-per-calls, and therefore urges continuation of the waiver for this minimum standard is merited.

G. Types of Calls (operator-assisted calls and billing for long distance calls)

For the same reasons that pay-per-call services are not possible for VRS calls, operator-assisted and billing for long distance calls are similarly not technically feasible. As noted above, IP networks do not support ANI, ALI, or end-user billing mechanisms. Without automated knowledge of the user's location, and no ANI to charge back for a operated assisted or long-distance call, VRS providers are unable to provide these relay features.

Because CSDVRS is unaware of any developments that will alleviate the technical difficulties of providing operator-assisted calls or billing for long distance calls, we request the FCC to renew the waiver for this minimum standard. However, CSDVRS does currently provide all long-distance calls free of charge to the customer, and handles most operated assisted calls, again without charge. CSDVRS also accepts the use of calling cards to place long-distance and/or operated assisted calls.

H. Equal Access to Interexchange Carriers

Because VRS utilizes an IP network which does not support ANI or ALI, we are unable to determine whether a call is local or long distance, and therefore, cannot automatically route the call to the caller's long distance carrier of choice. Due to the lack of a bill-back mechanism, it not technically feasible at this time to offer choice of interexchange carrier.

CSDVRS is unaware of any economically feasible technologies that are readily available in the marketplace to resolve the technical difficulties associated with providing VRS users with a choice of long distance carriers. However, as noted above, CSDVRS does not bill the cost of long distance calls to its customers in order to comply with the conditions of this waiver. CSDVRS urges the Commission to renew the waiver for this minimum standard.

I. Emergency Call Handling

On March 19, 2008, the FCC released its Report and Order on the handling of emergency calls by IP-based relay providers.² In this order, the FCC indicated that it did not intend to renew the waivers of the emergency call handling requirement for VRS and IP relay providers, which had been scheduled to expire after December 31, 2007. Rather, the FCC terminated these waivers as of the effective date of its R&O.

CSDVRS is in compliance with the current R&O for supporting emergency calls. Calls from a deaf user to the 911.csdvrs.tv URL are automatically placed at the top of the queue and receive priority handling. Until such time as a national numbering plan that correlates phone numbers to an IP addresses is in place, CSDVRS's VIs will obtain name and location information directly from each deaf caller that has an emergency, at the start of the call. The VI will then use a commercial database of public safety answering points (PSAPs) to determine the appropriate PSAP, and place the VRS call to the designated PSAP. The VI will announce him or herself to the PSAP call-taker, provide the name and address of the deaf user, and inform the call-taker of the type of emergency. The VI will also provide his or her name, VI number and a callback number for the PSAP to reach in case the voice call is disconnected. If one or both legs of the call are disconnected, the VI will immediately reestablish contact with the party(ies) that have been disconnected, when feasible.

² *In the Matter of Telecommunications Relay Services and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, Report and Order, CG Dkt No. 03-123; WC Dkt No. 05-196, FCC 08-78 (March 19, 2008).

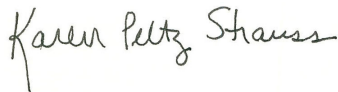
CSDVRS appreciates that the above procedures are interim, until such time as the FCC directs the full implementation of a national numbering scheme that will require building location databases and correlating phone numbers to IP addresses. At such time, VRS providers will have to contract for and implement complete E9-1-1 systems that use selective router technology to reach the PSAP locations via the “front door,” and deliver name, location and phone number information directly and automatically to the PSAP.

Respectfully submitted,

/s/

Sean Belanger, CEO
CSDVRS, LLC
600 Cleveland Street
Suite 1000
Clearwater, FL 33755

Of Counsel:



Karen Peltz Strauss
KPS Consulting
3508 Albemarle Street, NW
Washington, D.C. 20008
202-363-1263
kpsconsulting@starpower.net

April 16, 2008